



February 6, 2018

Dana Shaffer  
Deputy Chief & Chief of Staff  
Wireless Telecommunications Bureau  
Federal Communications Commission

VIA ELECTRONIC MAIL: [dana.shaffer@fcc.gov](mailto:dana.shaffer@fcc.gov)

Dear Ms. Shaffer,

We are in receipt of your January 24, 2018 letter requesting that we provide the Federal Communications Commission (FCC) with a listing of all Inmarsat-C terminals commissioned with the FCC as accounting authority of last resort with information sufficient to ensure contact of each terminal's owner and operator. Specifically, you requested the "current contact information including company name and point of contact name, mailing address, affected SATPHONE identity, contact phone number and contact email address." For a number of reasons, we do not have, nor are we able to provide you with, the information you request.

Although Inmarsat does maintain a database with information about these terminals, the information in the database is neither generated, verified, nor maintained by Inmarsat. This information is entered into the database by the accounting authority itself or by the company that commissioned the terminal (the point of service activation, or "PSA"). We have no way of knowing the status of the information, but some entries date back to the 1990s, indicating that the information is outdated. Indeed, we cannot confirm that the information was ever valid, and certainly not that it is current. Therefore, we cannot assert that we have information "sufficient to ensure contact of each terminal's owner and operator."

Even though Inmarsat does have a record of a unique Forward ID for each terminal registered with US01 as the accounting authority, Inmarsat's database does not distinguish between an accounting authority "of last resort" and any other accounting authority. With respect to each terminal, we do have information about the terminal's "owner", which could be a service provider, a reseller, or an end user, but we do not have information specific to the "operator" of the terminal. The unverified owner information may include a company name or point of contact, but may not include both. The owner information also includes a telephone number and mailing address, but only in rare cases does the information include an email address. We also have a record of the PSA for each terminal, and we do not know what additional information those entities might have about each terminal's owner or operator.

Moreover, Inmarsat's obligations to protect personal data prevent Inmarsat from sharing the information it has regarding the Inmarsat-C terminals, which is stored outside the United States and relates to non-U.S. persons, in the absence of a legal compulsion to do so.

I am happy to discuss this matter with you at your convenience.

Sincerely,

/s/ M. Ethan Lucarelli

M. Ethan Lucarelli  
Director, Regulatory and Public Policy  
Inmarsat